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15 *Co-Lead Counsel*

16 **UNITED STATES DISTRICT COURT**  
17  
18 **CENTRAL DISTRICT OF CALIFORNIA**

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28 *In re: Hyundai and Kia Engine*  
*Litigation II*

Case No. 8:18-cv-02223-JLS-JDE

**DECLARATION OF MATTHEW D.  
SCHELKOPF REGARDING  
PLAINTIFFS' SUPPLEMENTAL  
BRIEF IN SUPPORT OF MOTION  
FOR CLASS COUNSEL FEE AND  
EXPENSE AWARD AND CLASS  
REPRESENTATIVE SERVICE  
AWARDS**

Date: September 8, 2023  
Time: 10:30 a.m.  
Hon. Josephine L. Staton  
Courtroom: 8A

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DECL. OF MATTHEW D. SCHELKOPF REGARDING PLS.' SUPPL. BR. IN SUPP. OF MOT. FOR  
CLASS COUNSEL FEE AND EXPENSE AWARD AND CLASS REPRESENTATIVE SERVICE  
AWARDS

Case No. 8:18-cv-02223-JLS-JDE

1 I, Matthew D. Schelkopf, declare as follows:

2 1. I am an attorney admitted *pro hac vice* in this litigation, and a partner at  
3 the law firm of Sauder Schelkopf LLC (“Sauder Schelkopf”), and counsel of record  
4 for Plaintiffs in *In re: Hyundai and Kia Engine Litigation II*, No. Case No. 8:18-cv-  
5 02223-JLS-JDE (C.D. Cal.). I could and would competently testify to the matters  
6 stated in this declaration based on my personal knowledge or discussions with counsel  
7 in my firm.

8 2. This Court appointed me to serve as co-Lead Counsel alongside Steve  
9 Berman of Hagens Berman Sobol Shapiro LLP, and further appointed Gretchen  
10 Freeman Cappio of Keller Rohrback L.L.P. to serve as Settlement Counsel (together,  
11 “Class Counsel”) in this action. ECF No. 99, at 26.

12 3. I submit this supplemental declaration with Plaintiffs’ Supplemental Brief  
13 in Support of Motion for Class Counsel Fee and Expense Award and Class  
14 Representative Service Awards. Class Counsel seek \$8,900,000 in attorneys’ fees and  
15 actual costs up to \$300,000 for their work in this action that ultimately resulted in the  
16 class action settlement (“Settlement”) preliminarily approved by this Court on  
17 February 8, 2023. *See* ECF Nos. 99; 106.

18 **SAUDER SCHELKOPF SUPPLEMENTAL LODESTAR AND EXPENSES**

19 4. From June 24 to August 23, 2023, Sauder Schelkopf has spent 123.40  
20 hours litigating this case, for a total firm lodestar of \$95,465.00. A summary of hours  
21 incurred by timekeeper, with respective rates and roles included, is below:

| Name              | Role    | Rate  | Hours         | Lodestar           |
|-------------------|---------|-------|---------------|--------------------|
| Matthew Schelkopf | Partner | \$825 | 91.70         | \$75,652.50        |
| Joseph Kenney     | Partner | \$625 | 31.70         | \$19,812.50        |
| <b>Totals</b>     |         |       | <b>123.40</b> | <b>\$95,465.00</b> |

25  
26 5. We are concurrently submitting our firm’s supplemental detailed time  
27 records in the required Excel format for the Court’s review *in camera* to protect any  
28 privileged information.

1       6.     From June 24 to August 23, 2023, Sauder Schelkopf incurred \$413.56 in  
2 costs attributable to this litigation. This includes \$405.00 in mediation fees, and \$8.56  
3 in postage and mailing.

4       7.     Sauder Schelkopf is incurring more time and costs currently and expects  
5 to continue incurring time and costs through final approval, the claims deadline, and  
6 perhaps on appeal. Consistent with my prior Declaration in support of Plaintiffs'  
7 Motion for Class Counsel Fee and Expense Award and Class Representative Service  
8 Awards, my firm also expects to continue assisting class members with settlement  
9 claims and related issues for the foreseeable future. *See* Dkt. 106-6 ¶¶ 40-41.

10      8.     When combined with our time and costs previously submitted to the  
11 Court on July 7, 2023, Sauder Schelkopf has spent 1,000.2 total hours litigating this  
12 case, for a total lodestar of \$756,237.50. My firm has also expended \$14,633.56 in  
13 total costs.

14       I declare under penalty of perjury under the laws of the United States that the  
15 foregoing is true and correct.

16       Executed August 25, 2023, at Berwyn, Pennsylvania.

17       By: /s/ Matthew D. Schelkopf  
18                   Matthew D. Schelkopf